
DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON DC 20268-0001

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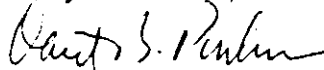
DOCKET NO. R97-1

FOLLOW-UP INTERROGATORIES OF DAVID B. POPKIN TO THE UNITED STATES
POSTAL SERVICE

David B. Popkin hereby requests the United States Postal Service to answer, fully and completely, the following follow-up interrogatories pursuant to Rules 25 and 26 of the Commission's Rules of Practice and Procedure along with Special Rule 2E. My instructions contained on my November 20, 1997 filing are incorporated by reference.

November 28, 1997

Respectfully submitted,



DAVID B. POPKIN, POST OFFICE BOX 528, ENGLEWOOD, NJ 07631-0528

DBP/USPS-103 This interrogatory concerns delivery of mail that is sent Certified Mail, Return Receipt Requested to Internal Revenue Service Center, Holtsville, NY 00501. For each part, if you do not confirm the statement in its entirety, please specify which parts of the statement you do not confirm. Also, for each part that you do not confirm, please provide a full explanation of every aspect of the statement that you do not confirm. [a] Please confirm that the Internal Revenue Service completes the return receipt, including the date of delivery, after the letters have been delivered to them. [b] Please confirm that during the tax season, the IRS may run a few days behind in processing return receipts. [c] Please confirm that the Postal Service does not check the dates shown on the return receipts to confirm that they match the date of delivery as shown on the delivery records. [d] For each part of this interrogatory, please provide the title of each person who provided the information on which the interrogatory response is based.

DBP/USPS-104 This interrogatory concerns delivery of mail that is sent Certified Mail, Return Receipt Requested to New Jersey Division of Taxation at various ZIP Codes in Trenton. For each part, if you do not confirm the statement in its entirety, please specify which parts of the statement you do not confirm. Also, for each part that you do not confirm, please provide a full explanation of every aspect of the statement that you do not confirm. [a] Please confirm that the New Jersey Division of Taxation completes the return receipt, including the date of delivery, after the letters have been delivered to them. [b] Please confirm that due to the overwhelming volume of Certified Mail, the Return Receipts are not handled until the mail is received in the mailroom of the Division of Taxation. [c] Please confirm that the Postal Service does not check the dates shown on the return receipts to confirm that they match the date of delivery as shown on the delivery records. [d] Please confirm that the Postal Service is unfamiliar with the procedures used by the Division of Taxation once the mail leaves the Processing and Distribution Center. [e] For each part of this interrogatory, please provide the title of each person who provided the information on which the interrogatory response is based.

DBP/USPS-105 This interrogatory concerns delivery of mail that is sent Certified Mail, Return Receipt Requested to Federal Communications Commission, Gettysburg, PA 17325. For each part, if you do not confirm the statement in its entirety, please specify which parts of the statement you do not confirm. Also, for each part that you do not confirm, please provide a full explanation of every aspect of the statement that you do not confirm. [a] Please confirm that the FCC receives a large number of certified letters on a daily basis. [b] Please confirm that due to the volume received, the Gettysburg Post Office delivers the mail to the FCC with the Return Receipt still attached and allows them to return them the following day. [c] Please confirm that the Postal Service does not check the dates shown on the return receipts to confirm that they match the date of delivery as shown on the delivery records. [d] For each part of this interrogatory, please provide the title of each person who provided the information on which the interrogatory response is based.

DBP/USPS-106 With respect to all forms of accountable mail, including but not specifically limited to Certified Mail - Return Receipt Requested, which is addressed to the Internal Revenue Service Center , Andover, MA 05501, please provide the following information: [a] Is the mail delivered by the Postal Service to the addressee at their location, or is it picked up by the addressee at a Postal facility, or is delivery performed in another manner [specify method]? [b] Describe the method utilized by the Postal Service to obtain the receipt from the addressee that the article has been received. [c] Is the delivery receipt completed before the accountable mail is turned over to the addressee or is it completed after it has been turned over to the addressee? [d] If it is completed after it has been turned over to the addressee, provide an indication of the time period between the delivery of the mail and the completion of the delivery receipt. Provide both a normal and a maximum time period. [e] Does the delivery receipt ever leave the control of the Postal Service? [f] If so, explain. [g] With respect to accountable mail which the sender has utilized Return Receipt service, are the Return Receipts completed by the addressee at the time of delivery? [h] If not, are the Return Receipts removed from the mailpiece at the time of delivery? [i] Is delivery of the mailpiece made with the Return Receipt still attached? [j] Provide an indication of the time period between the time of delivery and the return of the Return Receipt to the Postal Service. Provide both a normal and maximum time period. [k] Provide a listing of the of the checks and evaluations which are performed by an employee of the Postal Service to confirm the accuracy of the data contained on the delivery receipts including the method of signature and date of delivery. [l] Provide a listing of the of the checks and evaluations which are performed by an employee of the Postal Service to confirm the accuracy of the data contained on the Return Receipts including the method of signature and date of delivery [m] Provide an indication of the approximate number of pieces of accountable mail delivered to this addressee and the approximate percentage utilizing Return Receipt service. [n] Please provide details on the method utilized to "trap" the accountable mail so that it may be properly processed as accountable mail. [o] Approximately what percentage of the accountable mail is properly "trapped"? [p] Does the method of delivery which is utilized meet, IN ALL RESPECTS, the provisions of Section 822.1 of the Postal Operations Manual and Section D042.1.7 of the Domestic Mail Manual? [q] If not, fully explain.

DBP/USPS-107 Same as DBP/USPS-106 except for mail addressed to Internal Revenue Service, Holtsville, NY 00501.

DBP/USPS-108 Same as DBP/USPS-106 except for mail addressed to Internal Revenue Service, Philadelphia PA 19255.

DBP/USPS-109 Same as DBP/USPS-106 except for mail addressed to Internal Revenue Service, Memphis TN 37501.

DBP/USPS-110 Same as DBP/USPS-106 except for mail addressed to Internal Revenue Service, Atlanta GA 39901.

DBP/USPS-111 Same as DBP/USPS-106 except for mail addressed to Internal Revenue Service, Cincinnati OH 45999.

DBP/USPS-112 Same as DBP/USPS-106 except for mail addressed to Internal Revenue Service, Kansas City MO 64999.

DBP/USPS-113 Same as DBP/USPS-106 except for mail addressed to Internal Revenue Service, Austin TX 73301.

DBP/USPS-114 Same as DBP/USPS-106 except for mail addressed to Internal Revenue Service, Ogden UT 84201.

DBP/USPS-115 Same as DBP/USPS-106 except for mail addressed to Internal Revenue Service, Fresno CA 93888.

DBP/USPS-116 Same as DBP/USPS-106 except for mail addressed to Federal Communications Commission, Gettysburg PA 17325.

DBP/USPS-117 Same as DBP/USPS-106 except for mail addressed to Federal Communications Commission, Washington DC 20554.

DBP/USPS-118 Same as DBP/USPS-106 except for mail addressed to Federal Communications Commission in care of the Mellon Bank in Pittsburgh PA.

DBP/USPS-119 Same as DBP/USPS-106 except for mail addressed to United States Postal Service headquarters in Washington DC 20260.

DBP/USPS-120 Same as DBP/USPS-106 except for mail addressed to various agencies of the Federal Government in Washington DC.

DBP/USPS-121 Same as DBP/USPS-106 except for mail addressed to the District of Columbia tax bureau in Washington DC.

DBP/USPS-122 through 171 Same as DBP/USPS-106 except for mail addressed to each of the state tax bureaus located in each of the 50 states of the country.

DBP/USPS-172 With respect to accountable mail which is destined for delivery within the Akron, Ohio District, and in conjunction with the letter dated August 1, 1966 from Sandra D. Curran, Acting Manager, Delivery, relating to the proper handling of PS Form 3811 - Domestic Return Receipt. [a] Was this letter received by the District manager in August 1996? [b] If not, was it received it from the Postal Service after August 31, 1996? [c] If yes, provide the date that it was received. [d] Did the District Manager take the proactive approach by contacting all of the delivery offices and facilities within the District? [e] With respect to the first bullet item of the letter, PRIOR to the receipt of the August 1st letter, did any delivery arrangements exist, within the District, which allowed for the delivery of accountable mail with the Domestic Return Receipt still attached to the article and allowing it to be signed for at a "later", more convenient time? [f] If the evaluation indicated one or more arrangements existed within the District that permitted such delivery methods, did the Director ensure that they were reviewed and voided, if necessary, as noted in the fourth bullet item of the

August 1st letter? [g] If reviews were conducted, were there any instances where the delivery procedure was reviewed and still maintained? [h] If so, specify the nature and details of the arrangements. [i] With respect to the next to the last paragraph of the August 1st letter which indicates that arrangements which make it easier for the addressee, at the expense of that service, would not be tolerated, are there presently any arrangements, procedures, or agreements existing anywhere within the District which allow the accountable mail to be delivered with the PS Form 3811 still attached to it and therefore, to be completed at a "later", more convenient time? [j] If so, specify the nature of the arrangements. [k] Regardless of the size or type of the addressee, is it the policy of the District to have the Domestic Return Receipt PS Form 3811 completed and checked by the delivering USPS employee at the time of delivery of the associated accountable mail piece and processed in accordance with the applicable instructions in Section 822.1 of the Postal Operations Manual and Section D042.1.7 of the Domestic Mail Manual? [l] If not, specify the nature of the arrangements. [m] For each part of this interrogatory, please provide the title of each person who provided the information on which the interrogatory response is based.

DBP/USPS-173 through 257 Same as DBP/USPS-172, except for each of the other 84 Districts.

DBP/USPS-258 With respect to Express Mail which is destined for delivery within the Akron, Ohio District, please provide the following responses. [a] Are there provisions in place to ensure that all Express Mail will be delivered to all addresses within the District on all 365/366 days of the year in order to meet the Overnight or Second Day delivery standards based on the origin of the article? This includes holidays, Saturdays, and Sundays. It also includes all types of delivery addresses, including but not limited to, Post Office Box, City Delivery, Rural Delivery, and Highway Contract Routes. Delivery means actual physical delivery or actual attempt at physical delivery to the addressee and does not include telephoning the addressee to advise that the article may be picked up by them. [b] If not, advise and provide full details of any exceptions.

DBP/USPS-259 through 343
other 84 Districts.

Same as DBP/USPS-258, except for each of the

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.

David B. Popkin

November 28, 1997

David B. Popkin *David B. Popkin*
